

Proceeding: In the Matter of 1998 Biennial Regulatory Review -- Amendment of Part of the ☐ Record 1 of 1  
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**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	WT Docket No. 98-143
	)	
1998 Biennial Regulatory Review --	)	RM-9148
Amendment of Part 97 of the Commission's	)	RM-9150
Amateur Service Rules.	)	RM-9196
	)	
	)	

**COMMENTS OF EDWARD A. SCHOBER**

1. Edward A. Schober, a Technician Plus class radio amateur W2TED, continuously licensed as a radio amateur since February 1963, and as a Technician since 1964 hereby files these comments. He is a licensed professional engineer, specializing in the field of radio telecommunications and radio systems design. He holds a General Radiotelephone Operator License, and formerly held a First Class Radiotelephone Operator License. His interests in amateur radio are predominantly in emergency service, antenna design, and modulation systems design. He has been an active RACES operator for approximately twenty years, and a member of ARRL for much longer.

2. Mr. Schober generally agrees with the ARRL proposals for decreasing the number of license classes, increase in Volunteer Examiner Opportunities, proposals for helping the FCC to enforce its rules within the Amateur Service, and reduction in telegraphy examination requirements.

3. The Novice class license has outlived its usefulness, at least in its present form. The five word per minute code test is an anachronism from the time when a teenager could build a CW transmitter from scratch to get on the air, as Mr. Schober did. Today, the technology for a beginner to accomplish this is no longer as available. Gone are the 6L6 or 807 tubes, gone are the Heathkit transmitters. The entry level is now the no code Technician.

4. Grandfathering novices and Tech Plus licensees is a good idea, and removing the "Novice low power" sub-bands is good policy to allow re-farming of the bands. Mr. Schober proposes, however, that novices and non-upgraded Tech Plus licensees be permitted 200 Watt operation on the entire General Class HF CW bands at 80, 40, 15 and 10 meters. This alternate proposal makes sense because the low power "safe haven" of the novice sub-bands is destroyed by re-farming the sub-band, and it will be harder to find clear frequencies for low power operation by these operators in the FCC's proposed section 97.301(e) segments. This alternative will also simplify the rules. Mr. Schober sees no logic to the phrase "messages sent by hand" in the FCC proposed section 97.307(9). Novice and Technician plus operators should have the benefit of memory keyers, and computer keyers that any other operator may use, especially if the FCC agrees in its final rulemaking with the ARRL and Mr. Schober's comments that the General Class code speed should be 5 WPM.

5. Improving Volunteer Examiner Opportunities is a valuable goal. In all cases, Mr. Schober believes that a Volunteer Examiner should only be eligible to administer those examination elements (s)he has already successfully completed.

6. It is not clear that RACES licenses should be abolished. The primary reason that there are so few is that they have not been granted since 1980. I am surprised that 249 licenses have survived, since they may not be readily transferred, and at one time there were onerous limitations on their hours of operations. One advantage of the RACES station was that it had a distinctive call, so that the net members could tell that it was the Net control. RACES licensees are custodians who represent the Civil Defense agency, and are not necessarily amateur radio operators. This relationship is important to assure that the RACES operations done in the name of the agency are directly responsible to that agency. This relationship is lost when all stations are amateur stations operating in RACES.

7. With respect to privatization of enforcement actions, Mr. Schober believes that the Amateur Radio community has to assist the FCC in the enforcement of its rules. There is no way that the American Taxpayer should pay the entire bill for monitoring the amateur bands. It is also clear that there are individuals who are outlaws, whose interference and unlawful behavior must be stopped.

8. The FCC has requested comment on telegraphy requirements for the amateur radio service. Mr. Schober is an individual who has little interest in CW operation, but agrees with the majority of surveyed members that basic CW knowledge is valuable in the amateur licensing process, and should be a significant component of the proficiency for the highest class of amateur radio operator license. No longer can the Morse code skills learned in amateur radio provide career training, since there are now no careers requiring Morse as a perquisite. There remain the arguments of "last chance" emergency operation, but there are now digital modes which will "get through" where CW will not.

9. One remaining skill in CW which has value besides the enjoyment of using CW by those who are fluent is the ability to decode repeated low speed identifiers on transmitters. This is a skill needed by aircraft pilots and marine navigators, as well as radio amateurs who wish to identify the machine sent identifier CW on navigation and automatic repeater transmitters. This information may be critical to the safety of life. A five word per minute receiving skill is fully adequate to this task. This is the proper speed for the General Class examination.

10. Another benefit from making the CW proficiency for the General Class license equal to that of the present Novice and Technician Plus classes is that the upgrade path for these "grandfathered" licensees is now much more straightforward. Many (if not most) of the Technician Plus licensees have not upgraded to General Class due to the present awkward 13 WPM CW examination. It would be reasonable, if the General Class code requirement were 5 WPM to expect that all active Novice and Technician Plus licensees could upgrade to General Class within 5 to 10 years. If deemed desirable, a sunset on Novice and Technician Plus license renewals could be set 3-5 years from now, and effect no one.

11. Mr. Schober strongly objects to the FCC proposal at section 97.21(a)(3) that Technician Plus licenses would be renewed as an application for Technician class license. This represents a removal of HF privileges now enjoyed by these licensees. Those licensees who have licenses granted before March 21, 1987 have completed all of the examination requirements for General Class proposed by the ARRL, and all the examination requirements proposed by the FCC except element 1(B). The FCC proposal seeks to strip these amateurs of their HF privileges, while grandfathering Novice licensees. For many if not all of these licensees, disinterest or inaptitude in CW proficiency is the reason that these radio amateurs have not upgraded to General Class or higher. This rulemaking specifically calls into question the levels of code proficiency required for examination, and based upon Mr. Schober's reading of several dozen comments from the FCC's document server - the overwhelming consensus is that Technician Plus amateur licenses, at least those licensed before March 21, 1987 should be converted to General Class upon application.

12. The Extra Class is exactly that. It is not necessary to have this license to enjoy the hobby, it gives an extra 100 kHz of CW and 75 kHz of quiet spectrum to those who have shown the effort to reach the peak of their endeavor. As such there is no need to substantially "dumb down" the examination for this class of license. The fact that 100 kHz of spectrum is reserved for CW and other textual data for these experts means that they should be able to make use of the spectrum effectively. The extra CW bands have always been the province of the "good fists". Mr. Schober recommends that the CW requirement for this class be substantial, and that the awkward 13 WPM speed range be avoided. A reasonable range would be 15 - 20 WPM for this class license.

13. The Advanced Class shows that the amateur has achieved more than the "entry level" ham. I believe that there should be two tracks to this license class. Some radio amateurs are interested in traditional operating and wish to develop those skills, while others are more interested in the technical aspects of amateur radio. As a result, he proposes that there should be two combinations of elements which make a radio amateur eligible for the Advanced Class.

14. Mr. Schober proposes that the elements required to qualify for a amateur radio license be generally as outlined in the NPRM with the exception that element 1(C) be deleted, and element 1(B) be redefined as between 15 and 20 WPM both sending and receiving. He also suggests that element 4(B) be 50 questions instead of 40, with more emphasis on Radio wave propagation (advanced modes), electrical principles, and interference elimination techniques.

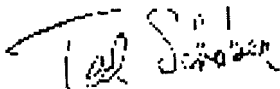
With this in mind, he proposes that section 97.501 read as follows:

An applicant must pass... the following examination elements:

- (a) Amateur Extra Class operator: Elements 1(B), 3(A), 3(B), 4(A) and 4(B)
- (b) Advanced Class operator: Elements 3(A), 3(B), 4(A) and either 1(B) or both 1(A) and 4(B)
- (c) General Class operator: Element 1(A) or 1(B), 3(A) and 3(B)
- (d) Technician Class: Element 3(A)

15. In summary, Mr. Schober believes that the ARRL proposal as filed is more closely in line with the needs of the Amateur Service than the FCC Proposed rulemaking; that the FCC proposal to downgrade Technician Plus amateur licensees to Technician class is unfair and unwarranted; that the proper CW speed requirement for General Class license examination is 5 WPM, receive only; That Extra Class licensing should require a high level of performance in both technical and operating skills; and that the Advanced Class license applicants should have two licensing tracks to choose from. In other areas, he sees no need for "hand sending" of CW by novice class licensees, or restricting Novice class licensees to small HF sub-bands. He sees a value in RACES licenses, but only if new ones can be issued, and believes that Volunteer Examiners should only be able to administer examinations that they have themselves taken.

Respectfully submitted,



Edward A. Schober  
Amateur Radio Operator W2TED